

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Tonawanda Coke Corporation - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region II

**Subject:** POLREP #24  
RV1  
Tonawanda Coke Corporation  
0201601  
Tonawanda, NY

**To:** Peter Lopez, EPA, Region 2  
Christopher Lyon, EPA ORA Region 2  
Walter Mugdan, EPA ORA, Region 2  
Angela Carpenter, EPA ERRD, Region 2  
John Prince, EPA ERRD, Region 2  
Eric Wilson, EPA ERRD, Region 2  
Joe Rotola, EPA RAB, Region 2  
Eric Mosher, EPA RPB, Region 2  
Tim Grier, EPA OLEM-OEM  
Leonard Voo, EPA DECA, Region 2  
Dore LaPosta, EPA DECA, Region 2  
Dan Harkay, EPA RAB, Region 2  
Shawna Hoppe, EPA RPB, Region 2  
Mark Pane, EPA RAB, Region 2  
Thomas Budroe, EPA RAB, Region 2  
Peter Lisichenko, EPA, RAB Region 2  
Dwayne Harrington, EPA RPB, Region 2  
Harish Patel, EPA DECA, Region 2  
Douglas McKenna, EPA DECA, Region 2  
James Doyle, EPA ORC, Region 2  
Margo Ludmer, EPA ORC Region 2  
Mary Mears, EPA PAD, Region 2  
Michael Basile, EPA PAD, Region 2  
James Quinn, NYSDEC  
Christopher LaLone, NYSDEC  
Kevin Hale, NYSDEC  
Bonnie Hriczko, EPA RAB, Region 2  
Tim Benton, Weston Solutions

**From:** Peter Lisichenko, OSC

**Date:** 11/18/2018

**Reporting Period:** 11/15/18 through 11/18/18

1. Introduction

1.1 Background

<b>Site Number:</b>	A28U	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	10/17/2018	<b>Start Date:</b>	10/17/2018
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	NYD088413877	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	Yes
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

1 Incident Category

Abandoned coke manufacturing plant releasing hazardous substances into the environment.

1.1.2 Site Description

Tonawanda Coke Corporation is a coke manufacturing plant; approximately 160 acres in an industrial area. The facility has been in operation for approximately 100 years. The 30 currently operating coke ovens have been in use since early 1960.

1.1.2.1 Location

The facility is located at 3875 River Rd, Tonawanda, Erie County, New York. The area is an industrial area adjacent to the Niagara River. The nearest residence is located approximately 0.25 miles away.

1.1.2.2 Description of Threat

Flammable liquids contained in bulk storage tanks pose a threat of fire and explosion should they encounter an ignition source. Sodium hydroxide, a corrosive material, has been discharged onto the ground and poses a health threat to anyone who may come in contact with this material. One scrubber tower contains a pyrophoric material which may spontaneously combust if the nitrogen blanket inside the vessel is not

maintained. Drums of hydrochloric acid and solvents are being stored on an unpaved surface without secondary containment. A full removal site evaluation will be conducted and addressed following facility shutdown.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA is evaluating the Site, to identify all areas of concern and determine which facility operations will require EPA's immediate attention to circumvent a release of hazardous substances to the environment.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.2 Response Actions to Date

See previous POLREPS for additional response actions.

All boiler and process operations necessary to treat the contaminated aqueous waste streams stored/generated on-site are continuing.

ERRS contractor continued to excavate contaminated soil in the processing area. Working the north side of the Light Oil Processing Tanks, 175-square foot area was completed and subsequently backfilled. The depth of excavation is from the surface down to 6-inches below grade and is intended to mitigate the migration of contaminants to the stormwater system. Sludge like material is being bulked in 55-gallon drums while the stained soils is being staged in lined containment areas. To date, approximately 75-cubic yards has been excavated. Disposal characterization samples had been collected by the RST contractor and submitted for analysis. Excavated areas are being backfilled with 2-inch crusher-run gravel (with fines). In addition to the soils, ERRS removed and drummed the coke process waste from the Tar Precipitator including the soils on the south side of the Tar Precipitator.

The ammonia solution transfer from the south storage tank (ST23) to the weak ammonia liquor tank (PT02) continues. For this operational period, approximately 56,310 gallons of ammonia solution were transferred from the south to the north tank for treatment in the Ammonia Still System at a rate of 40-gallons per minute. In total, approximately 200,010 gallons of ammonia solution has been processed.

The process to de-energize and take off-line utilities in unused portions of the facility is underway. Power and steam has been terminated to the coke ovens and coal handing structures including Battery No. 2, Coal Handling Building, Coal Screening and Loading Station, Coal Breaking Building, and the subsurface conveyor system from the coal yard. The Town of Tonawanda has been contacted and will assist with the closure of water supply to these buildings on Monday, November 19, 2018. The facility fire suppression system (i.e. water hydrants) is operated on a separate system.

A meeting between Powers Coal & Coke (Powers) and the OSC was held on Friday, November 16, 2018, at the Facility to discuss the removal of coal and coke currently stored at the facility. Powers will arrange for the loading and transportation of material from TCC to a facility in Lackawanna, New York. The material will be loaded during regular site hours and is tentatively scheduled to begin on Monday, November 26, 2018. The release of the coal tar material is pending the receipt of analytical results from the laboratory.

#### 2.1.3 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

TCC filed for bankruptcy on October 16, 2018. ORC continues to represent EPA's interest with TCC attorneys.

### 2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

1. Continuing operating the boiler and supporting systems.
2. Continue running the Ammonia Still System to treat the weak ammonia liquor and other generated aqueous waste.
3. Continue to pump the contaminated water from the containment and sump areas for treatment in the Ammonia Still System.
4. Conduct a cleanup of the contaminated soil around six different sump areas to mitigate the cross contamination of surface water.
5. Move all containers and vessels containing hazardous substances, pollutants or contaminants, which are currently improperly stored, to a containment area.
6. Continue to maintain and monitor both the plant process water and the surface storm water systems
7. Sample, analyze, remove and ship the hazardous substances, pollutants or contaminants in plant process vessels for disposal.
8. Clean and subsequently remove the plant process containment areas.
9. Winterize the vessels and pipes on the Site to protect from freezing.
10. Evaluate methodology for sealing the sumps at the site.

#### 2.2.1.2 Next Steps

EPA will continue to assess the potential public and environmental threats posed by the Site.

### 2.2.2 Issues

Electrical and mechanical breakdowns continue to occur due to the antiquated, poor condition of the plant equipment.

### 2.3 Logistics Section

No information available at this time.

### 2.4 Finance Section

EPA is funding the removal action. The costs below include pending costs.

#### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$550,000.00	\$478,327.63	\$71,672.37	13.03%
TAT/START	\$50,000.00	\$0.00	\$50,000.00	100.00%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$600,000.00</b>	<b>\$478,327.63</b>	<b>\$121,672.37</b>	<b>20.28%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

### 2.5 Other Command Staff

No information available at this time.

## 3. Participating Entities

### 3.2 Cooperating Agencies

EPA is coordinating with, DOJ, NYSDEC and the Town of Tonawanda Water Resources Department.

## 4. Personnel On Site

One OSC, 15 ERRS personnel and 2 RST3 personnel.

## 5. Definition of Terms

No information available at this time.

## 6. Additional sources of information

## 7. Situational Reference Materials

No information available at this time.